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## BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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Docket No. R2001-1

MOTION OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO FOR AN ORDER AUTHORIZING LATE FILING OF ITS NOTICE OF INTERVENTION (October 26, 2001)

In accordance with the rules of practice, 39 C.F.R. Section 3001.20(c), the American Postal Workers Union, AFL-CIO ("APWU") hereby moves for an order authorizing the late filing of its notice of intervention, which is submitted herewith.

Acceptance of APWU's filing will not delay these proceedings. Moreover, there is no conceivable prejudice to any party. APWU respectfully submits that, in light of its substantial interest in the outcome of this proceeding (set forth in the notice of intervention), APWU's motion should be granted.

Respectfully submitted,

AMERICAN POSTAL WORKERS UNION, AFL-CIO

by its attorneys:

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

Date: October 26, 2001

Susan L. Catler